

Message

From: Mary Ann Hogan [maryann.hogan@csctruck.com]
Sent: 1/31/2018 5:22:53 PM
To: Healy, Stephen [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=d1638b0a30364c7d98ea7af410a9cb2a-Healy, Stephen]
Subject: Re: GLIDER ASSEMBLER REQUEST

Thank You Stephen

Working on this now

Mary Ann Hogan | Michigan Kenworth - Grand Rapids | Administrative Assistant | 616.281.8610 |
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On Wed, Jan 31, 2018 at 11:36 AM, Healy, Stephen <healy.stephen@epa.gov> wrote:

Mary Ann,

I have two questions. The number of sales listed is greater than the number of gliders assembled; is this correct. The sales column should reflect the number of assembled gliders that were sold. The number of employees seems a bit low for a company like CSM Trucks. The employment totals should reflect the total number employees for Michigan Kenworth as well as affiliated companies. Michigan Kenworth appears to be part CSM Truck which has multiple locations and the employment total should reflect this. Currently the size threshold for Heavy Duty Truck Manufacturers is 1500 employees – this is what is listed for NAICS Code 336120. The total number of employees includes that of the company and its affiliates (see 13 CFR 121 link below). Here are links to the regulation sections that clarify the total employment requirements for a small business:

40 CFR 1037.150 Interim Provisions – this covers the small business exclusion requirements (1037.150(c)) and the new interim glider requirements (1037.150(t)):

http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=7b7047abdd965bd6a1b219b7b036fad9&mc=true&n=pt40.36.1037&r=PART&ty=HTML#se40.36.1037_1150

13 CFR Part 121

Small business general provisions: describes how to determine affiliations and determine employee count:

<http://www.ecfr.gov/cgi-bin/text-idx?SID=266ad73e48d34146461d5b3cc2a0d1ab&mc=true&node=sg13.1.121.a.sg0&rgn=div7>

Size standards for small business:

http://www.ecfr.gov/cgi-bin/text-idx?SID=266ad73e48d34146461d5b3cc2a0d1ab&mc=true&node=se13.1.121_1201&rgn=div8

Please give me a call if you have further questions.

Thank you,

Stephen Healy

Mechanical Engineer

EPA OTAQ Compliance Division

Diesel Engine Compliance Center

734--214-4121

From: Mary Ann Hogan [mailto:maryann.hogan@csmtruck.com]

Sent: Wednesday, January 31, 2018 10:35 AM

To: Healy, Stephen <healy.stephen@epa.gov>; James Kamps <james.kamps@csmtruck.com>

Subject: GLIDER ASSEMBLER REQUEST

Good Morning Stephen,

Please process for us

Thank You

Mary Ann

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